

# EXHIBIT 5

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IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No. 17-md-2804

Judge Dan Aaron

This document relates to: Polster

County of Cuyahoga v. Purdue  
Pharma L.P., et al.

City of Cleveland, Ohio v. Purdue  
Pharma L.P., et al.

The County of Summit, Ohio, et al.  
v. Purdue Pharma L.P., et al.

Case No. 1:18-OP-45132

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Videotaped deposition of  
CALVIN D. WILLIAMS

December 5, 2018

9:06 a.m.

Taken at:

Ulmer & Berne

1660 W. 2nd Street, Suite 1100  
Cleveland, Ohio

Renee L. Pellegrino, RPR, CLR

Veritext Legal Solutions

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1 field operations.

2 Q. And is it also consistent with the  
3 job you're trying to do as the chief of police?

4 A. Exactly.

5 MS. WINNER: Thank you very much for  
6 your time. We'll go off the record so we could  
7 switch places and I think there are people who  
8 have a few more questions for you and then we'll  
9 be done.

10 THE VIDEOGRAPHER: It is 5:51.  
11 Going off the record.

12 (Short recess had.)

13 THE VIDEOGRAPHER: It is 5:52. We  
14 are back on the record.

15 MR. PIFKO: For the record, I think  
16 it's outrageous that you're going to ask him  
17 questions. I cannot believe that you think it's  
18 appropriate. Your name is literally on exhibits  
19 that she just handed to him, so I object. And  
20 you can -- obviously I'm not going to stop you  
21 because I'll give you the opportunity to do  
22 that, but I'm going to reserve my right to  
23 strike any testimony that you're going to obtain  
24 right now.

25 MS. RENDON: Mr. Pifko, is there a

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1 rule or a statute or other legal authority that  
2 is the basis of your objection?

3 MR. PIFKO: Yes. There's a lot of  
4 authority. We're going to talk about it after I  
5 get some more facts from you.

6 MS. RENDON: Actually, I would like  
7 to know if there is a specific rule or statute  
8 or other legal authority that you're resting on,  
9 because if there is one, I would like the  
10 opportunity to look at it, take a recess --

11 MR. PIFKO: You have inside  
12 contemporaneous information. For example,  
13 you're on this e-mail, that Ms. Winner handed to  
14 him, in 2016. You have contemporaneous  
15 knowledge of --

16 MS. RENDON: Mr. Pifko --

17 MR. PIFKO: You've talked to the  
18 narcotics division, you've talked to people  
19 one-on-one, you have inside information, and  
20 you're using it -- which you have gained as a  
21 public official, with taxpayer dollars, and  
22 you're using it now for hire for Defendants in  
23 this case.

24 MS. RENDON: Mr. Pifko, what rule  
25 are you referencing, please?

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1 MR. PIFKO: I think it's a conflict,  
2 and I think that it's improper for you to use  
3 that information when you're a fact witness in a  
4 case and be counsel at the same time.

5 MS. RENDON: So, for the record,  
6 because I just want to make sure that I  
7 understand this, you have not provided me with a  
8 rule or a statute or a piece of legal  
9 authority --

10 MR. PIFKO: I'm stating my  
11 objection.

12 MS. RENDON: Would you allow -- I  
13 allowed you to finish your comments.

14 MR. PIFKO: In due course --

15 MS. RENDON: I would ask you allow  
16 me the same professional courtesy to finish what  
17 I am saying, Mr. Pifko, for the record. So I  
18 just want to make sure that I understand.

19 MR. PIFKO: I'm not really  
20 interested in what you have to say.

21 MS. RENDON: Mr. Pifko, can you  
22 please identify for me by rule number and by  
23 statute --

24 MR. PIFKO: That's not how things  
25 work, okay.

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1 MS. RENDON: -- the basis of your  
2 objection?

3 MR. PIFKO: I stated it with  
4 clarity.

5 MS. RENDON: And that's it, that's  
6 the sole basis for your objection?

7 MR. PIFKO: We're going to find out.  
8 I don't have all the facts yet.

9 MS. RENDON: Is there any other  
10 basis as you're sitting here today for the  
11 objection that you're raising?

12 MR. PIFKO: Based on what I know  
13 now, I don't have all the facts, so we're going  
14 to get there.

15 EXAMINATION OF CALVIN D. WILLIAMS  
16 BY MS. RENDON:

17 Q. Chief, as I mentioned earlier this  
18 morning, I represent the Endo Defendants in this  
19 case.

20 Earlier today you testified that  
21 "our relationship with the community drives a  
22 lot of what we do." Do you recall that  
23 statement?

24 A. Yes.

25 Q. Explain to me what you mean by that.